



July 17, 1991

Ms. Lydia Odgen Askew
Community Involvement Liaison
Division of Health Assessment and Consultation
ATSDR
Mailstop E-32
1600 Clifton Road, N.E.
Atlanta, Georgia 30333

Subject: Preliminary Health Assessment for Monsanto - Soda Springs Plant, June 6, 1991

Dear Ms. Askew:

The Environmental Protection Agency (EPA) has reviewed the above-referenced report and has the following comments:

- 1) **Page 5, first paragraph:** Formation Springs and Ledge Creek Springs are not both "located to the northeast of both the town and the plant" as is implied in the third sentence of that paragraph. They are both located northeast of the town, but only Formation Springs is northeast of the plant. Ledge Creek Springs is located southeast of the plant. In the fourth sentence of that paragraph, it is implied that both springs are hydraulically upgradient from Monsanto, whereas it is thought that only Formation Springs may be upgradient. It is yet to be determined whether Ledge Creek Springs is hydraulically connected to the aquifer affected by the site.
- 2) **Page 5, first paragraph:** In the second to last sentence of that paragraph, it is unclear what residence is being referred to.
- 3) **Page 10, third paragraph:** It should be noted that stack emissions at Monsanto are currently regulated under the national emissions standards for hazardous air pollutants. However, the potential impact to the environment from historical emissions on the area surrounding the site has not been evaluated.
- 4) **Page 14, Recommendations 6 and 9:** These two recommendations address the radiation contamination levels in the Soda Springs area that may be attributed to the use of slag in building foundations and roads. Because these recommendations are given in the context of a health assessment specific to this site, it could

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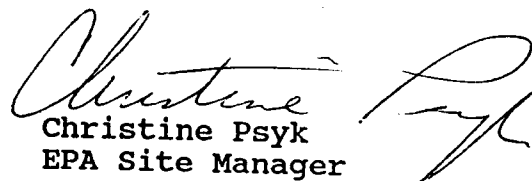
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be inferred that ATSDR is requesting that these recommendations be addressed in the course of the Superfund activities that will be undertaken at the site. It is unclear whether that is the intent. However, it should be noted along with these recommendations that at this time it has not been determined whether these radiation concerns will be addressed in the context of the remedial investigation and potential cleanup at the site, or whether they will be addressed independently of investigations and actions at the site. EPA is awaiting recommendations from the Science Advisory Board concerning the Idaho Radionuclide Study. It will then evaluate how to proceed on this issue. The intent is to be consistent in approach with respect to all the southeast Idaho Superfund sites at which slag is a concern.

Should you have any questions or need clarification regarding the above, please call me at (206) 553-6519.

Sincerely,


Christine Psyk
EPA Site Manager

cc: Kevin Oates, Superfund
Tim Brincefield, Superfund
Dan Phalen, Superfund
Bill Adams, Superfund
Gregg Thomas, ATSDR